

SIA-008      Re:    Universal Service Offerings

Does WW provide white page directory listing services anywhere within the State of Kansas?

**RESPONSE:**

Western Wireless does not provide white pages listing services in Kansas today.

SIA-009      Re:    Universal Service Offerings

Does WW intend to, at some point in time, offer white page directory and listings, if so, when?

**RESPONSE:**

White pages listings are not a requirement for ETC designation in Kansas. Western Wireless does not intend to offer white pages directory listings in Kansas unless there is sufficient customer demand for such service.

SIA-010      Re:    Certification

If the KCC determines that WW Wireless Local Loop ("WLL") service is subject to the jurisdiction of the KCC, is WW willing to meet the state certification requirements?

**RESPONSE:**

Western Wireless first states that in accordance with a recent FCC Order, only the FCC, not a state commission, can determine that a particular offering is not a commercial mobile radio service under federal law. In the Matter of Amendment of the Commission's Rules to Permit Flexible Service Offerings in the Commercial Mobile Radio Services, WT Docket No. 96-6, Second Report and Order and Order on Reconsideration, FCC 00-246, ¶ 7 (July 20, 2000). If a determination is made that Western Wireless must obtain a certificate to provide wireless local loop service, Western Wireless would have to evaluate whether it would be willing to obtain a certificate and continue making such an offering.

SIA-011      Re:    Regulation

If the KCC decides that WW's WLL service is subject to KCC jurisdiction, is WW willing to provide its costs to the KCC?

**RESPONSE:**

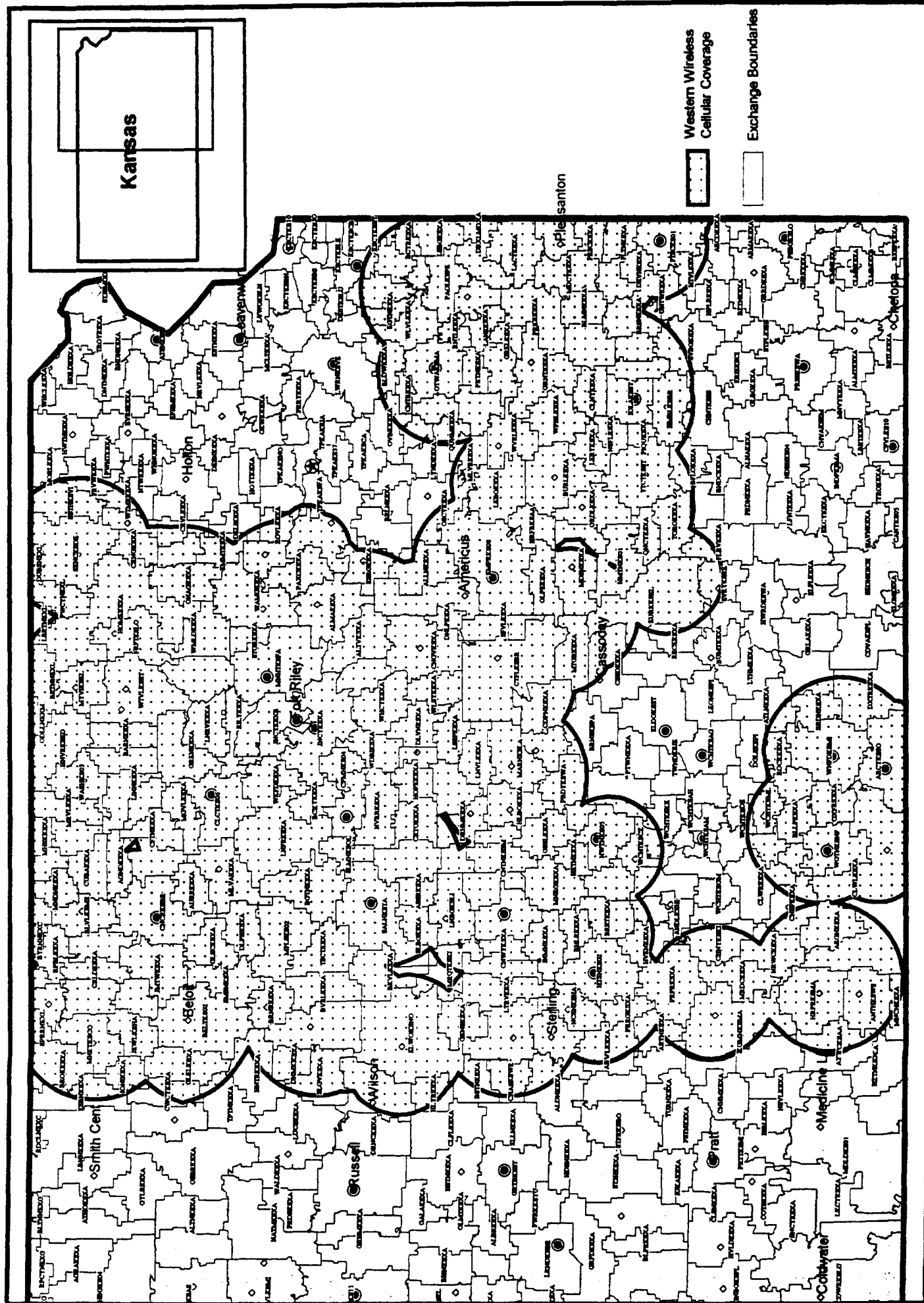
SIA's motion to compel a response to this data request was denied by the KCC.

SIA-012      Re:    Universal Service Offerings

To what extent are high-speed data transmissions currently offered by WW to customers in Kansas? Where are they offered? Are they offered to residential or business customers or both? Please provide supporting data.

**RESPONSE:**

Western Wireless states that this question is vague and ambiguous in its use of a completely undefined term: high-speed data transmissions. The testimony of Mr. Blundell is that the Company would provide data speeds in excess of speeds currently offered by landline companies by the end of next year. Today, Western Wireless does not consider itself to be providing high-speed data transmissions in Kansas.



SIA-015      Re:    Signal Strength

Please provide a separate map indicating WW's cellular service areas identified in Exhibit A to WW's BUS Offering, specifically identifying the following:

- a.      those service areas where signal strength is greater than  $-65$ 's dBm;
- b.      those service areas where signal strength is  $-800$  dBm to  $-65$  dBm;
- c.      those service areas where signal strength is  $-100$  dBm to  $-80$  dBm; and,
- d.      those service areas where signal strength is less than  $-100$  dBm.

**RESPONSE:**

The map attached in response to SIA-014(b) depicts signal strength with a threshold of  $-104$  dBm, which shows areas in which customers can obtain a signal using a wireless access unit. Western Wireless does not have maps that reflect signal strength at the other identified levels, and such maps are not relevant to the coverage area for Western Wireless' universal service offering. This map illustrates Western Wireless' coverage area for purposes of this proceeding.

SIA-016      Re:    Cellular Coverage

Please identify on a map showing all of WW's Kansas service areas in regards to those found in Exhibit A to WW's BUS Offering, where WW's service are analog and where they are digital. In those locations where the services are analog, with specificity, please identify as follows:

- a.      those areas where WW's network capacity is less than 10 voice channels;
- b.      those areas where WW's network capacity is 10 to 16 voice channels; and,
- c.      those areas where WW's network capacity is greater than 16 voice channels.

**RESPONSE:**

See map produced in response to SIA-014(a), which is **Confidential** Information produced subject to the terms of the Protective Order entered in this docket. This map is Confidential Information because it is market-specific information relating to services offered in competition with others, and is private technical and business information. The three sites designated by an asterisk have digital control channels and digital voice channels. All other cell sites only have digital control channels.



SIA-017      Re:    Interconnection

Please provide a list of all local exchange companies in Kansas with which WW has interconnection agreements and reciprocal compensation agreements.

**RESPONSE:**

Western Wireless is interconnected to every local exchange company in Kansas via the public switched network. Western Wireless is directly interconnected, and has a direct interconnection agreement, with Southwestern Bell and does not have direct interconnection agreements with any other local exchange company in Kansas. For those local exchange companies other than Southwestern Bell, Western Wireless is indirectly interconnected, and the parties reciprocally compensate each other through the bill and keep method of reciprocal compensation. When local exchange companies request alternative methods of reciprocal compensation, Western Wireless gladly enters into discussions and ultimately enters into direct interconnection agreements with alternative methods of reciprocal compensation.

SIA-018      Re:    Interconnection

Please provide a copy of each interconnection agreement and reciprocal compensation agreement between WW and a Kansas local exchange company.

**RESPONSE:**

See attached agreement with Southwestern Bell. All other arrangements for reciprocal compensation with local exchange companies in Kansas are on a bill and keep basis.

SIA-019      Re:    Universal Service Offerings

K.S.A. 66-1,187(q) provides:

“Enhanced universal service” means telecommunications services, in addition to those included in universal service, which shall include: Signaling system seven capability, with CLASS service capability; basic and primary rate ISDN capability, or the technological equivalent; full-fiber interconnectivity, or the technological equivalent, between central offices; and broadband capable facilities to: All schools accredited pursuant to K.S.A. 72-1101 *et seq.*, and amendments thereto; hospitals as defined in K.S.A. 65-425, and amendments thereto; public libraries, and state and local government facilities which request broadband services.

Of the enhanced universal services set out in K.S.A. 66-1,187(q) as defined in K.S.A. 66-1,187, which services does WW currently provide?

**RESPONSE:**

Western Wireless currently provides signaling system seven capability with CLASS service capability. All the other services set forth in K.S.A. 66-1,187(q) above are landline services that are inapplicable to a cellular network.

SIA-020      Re:    Rates of Services

Please explain WW's current policies and practices regarding notifying customers of changes in rates or terms of service, including:

- a.      the manner, if any, in which WW provides customers with notice of changes in the rates or terms of its service; and,
- b.      how many days in advance of such a change is the notice given.

**RESPONSE:**

SIA's motion to compel a response to this data request was denied by the KCC.

SIA-021      Re:    Local Calling Areas

For each rural LEC exchange listed in Exhibit A of Western Wireless' basic universal service offering compliance filing please provide the local calling area in which WW customers will be able to call within the unlimited flat rate of \$14.00 per month.

**RESPONSE:**

In response to the Commission's directive, the following is in response to SIA's clarification of its request:

- a. Will Western Wireless offer county-wide calling to multiple counties to all customers in a given rural ILEC exchange if that exchange area includes customers in multiple counties? Response: No. The customer will have county-wide local calling only for his or her county of residence.
- b. Clarify the statement "The local calling area also includes additional exchanges, if such exchanges are part of an extended area of service available to any customer in the county." Response: If a LEC customer of Exchange A—which exchange is fully or partially within County Z—has EAS to Exchange B—which exchange is not fully or partially within County Z—then exchange B is part of Western Wireless' local calling area for customers residing in County Z.
- c. Does Western Wireless intend to add additional exchanges not identified as county-wide or EAS based on "community of interest"? Response: Not at this time.

SIA-022      Re:    Lifeline and Link-up

In regards to WW's commitment to participate in Lifeline and Link-up programs – will WW participate only in the Federal programs, or will it also participate in the Kansas Lifeline Service Program?

**RESPONSE:**

Western Wireless will participate in both the federal and state Lifeline and Link-up programs, assuming the state programs are lawful and federal compliant.

SIA-023      Re:    Lifeline and Link-up

Please explain how WW's customers will participate in a Federal Lifeline program. In that explanation, please include at a minimum a discussion of WW's policies for verifying low-income customer eligibility criteria, what support amount per customer WW expects to receive, and how WW will apply any Lifeline reimbursement amounts it receives from the Universal Service Administration Corporation.

**RESPONSE:**

When a customer seeks the Lifeline discount, Western Wireless will obtain proof of eligibility in accordance with 47 C.F.R. § 54.409, a customer service person will check the applicant's proof of public assistance and Western Wireless will verify such proof with the state department of social services. Western Wireless will receive the same amount as do landline incumbent carriers for each Lifeline customer, and the Company will apply that support amount to discount the customer's bill, as required by 47 C.F.R. § 54.403.

SIA-024      Re:    CALEA

Please explain how WW plans on complying with the Communications Assistance for Law Enforcement Act (CALEA), and the resultant policies and procedures adopted by the FCC and FBI.

**RESPONSE:**

Western Wireless has adopted policies and procedures for the implementation of CALEA. A copy of those policies and procedures is attached and marked **Confidential**. In addition, Western Wireless has proposed a Flexible Implementation Schedule ("FIS"), as required by FCC Order, and the FBI has acknowledged receipt of such Schedule. Western Wireless and the FBI are now working to finalize the FIS. The submission of the FIS, the FBI's acknowledgment, and the further effort toward a final FIS are the steps currently required by FCC Order.



SIA-026      Re:    Truth-in-Billing

Will WW comply with the FCC's Truth-in-Billing requirements? If so, please explain the specific steps WW had taken to ensure its BUS offering bills are clear and concise and otherwise comply with Truth-in-Billing rules.

**RESPONSE:**

To the extent the federal truth-in-billing requirements apply to CMRS carriers, Western Wireless complies. Western Wireless designed its billing system in such a way as to comply with all applicable federal regulations, and the Company has not been the subject of a complaint.

SIA-027      Re:    Mobility

As Mr. Blundell stated in his direct testimony (Page 14, lines 7-8), WW's BUS offering will include a mobility component. Please explain, in detail, including the equipment necessary, the configuration thereof, and the steps to be taken by the end user, the process for converting the customer's wireless access unit, and any necessary peripheral equipment such as external high-gain antennae, into a mobile station.

**RESPONSE:**

As a legal matter, the wireless access unit is a mobile station, and Western Wireless' wireless local loop offering is CMRS, so no "conversion" to a mobile station is necessary, nor is additional equipment necessary. For almost all customers, the wireless access unit can simply be unplugged from the wall (assuming the battery pack is installed), and taken with them. Those few customers using a high-gain antenna to increase signal quality at their residence may choose to unplug the high-gain antenna and plug in the standard antenna that comes with the unit. If the high-gain antenna has been mounted on the home, it will have to be unplugged before it is moved.

SIA-028      Re:    Regulation

Is it WW's position that the FCC order referenced on page 11, lines 10-18 of Mr. Blundell's rebuttal testimony explicitly preempts any KCC regulation of any type of service WW decides to provide?

**RESPONSE:**

SIA's motion to compel a response to this data request was denied by the KCC.

SIA-029      Re:    Infrastructure

Please provide a detailed summary of the infrastructure commitments WW will make for the rural LEC study areas in which it seeks to receive ETC designation, excluding any investment necessary to provide adequate signal strength throughout a given study area.

**RESPONSE:**

The Company will make whatever infrastructure improvements and expansions are necessary to fulfill the obligation to serve, and continue to serve, its universal service customers in the designated service areas in Kansas. Depending on Western Wireless' penetration and the calling patterns of its universal service customers, Western Wireless may need to add capacity to its network by adding channels to a cell site, sectorization, or building a new cell site. At this time, Western Wireless does not know whether this will be necessary in Kansas, however, it has not been necessary in Minnesota or in the Southwestern Bell exchanges in which it has rolled out universal service offerings.

SIA-030      Re:    Advanced Universal Services

Please explain how WW's BUS offering can be used to provide advanced telecommunications services as those services are defined by the FCC.

**RESPONSE:**

Western Wireless states that this question is vague and ambiguous. If the question refers to the FCC's definition of "advanced telecommunications capability" as having the capability of supporting two-way data speeds in excess of 200 kbps per second, Western Wireless' BUS current offering does not provide consumers with that capability.

SIA-031      Re:    Advanced Universal Services

Please explain how WW's current BUS offering is capable of support applications such as telemedicine, distance learning, and high speed access to Internet providers.

**RESPONSE:**

Western Wireless' current BUS offering does not support telemedicine or distance learning. With regard to high speed data, see Western Wireless' response to SIA-012.

SIA-032      Re:    Universal Service Offerings

Please provide the name and locations of all hospitals where WW's Phonocell SX Wireless Access Unit is currently in use?

**RESPONSE:**

SIA's motion to compel a response to this data request was denied by the KCC.

SIA-033      Re:    Interconnection

Describe, in detail, how WW will track, record, exchange billing data, and compensate other incumbent Kansas Local Exchange carriers for the transport and/or termination of that exchange and interexchange traffic traversing its network and for which WW intends to pay other LECs for termination and transport.

**RESPONSE:**

The method by which Western Wireless will track and record traffic, exchange billing data, and reciprocally compensate Southwestern Bell is set forth in the interconnection agreement produced in response to SIA-18. Because Western Wireless and each other Kansas ILECs exchange traffic on a bill and keep basis, neither party tracks or records traffic, or exchanges billing data. If and when Western Wireless enters into an agreement with any Kansas ILEC that requires it to implement different procedures, it will do so in accordance with such agreement.



SIA-034      Re:    Interconnection

If other telecommunications carriers/providers utilize WW's network to transport and/or terminate interexchange traffic, will WW compensate the terminating carrier for that traffic? At what rates?

**RESPONSE:**

Western Wireless states that this request is confusing, vague and ambiguous. Other carriers do not use Western Wireless' network to transport interexchange traffic that would terminate to a customer of an SIA company. If other carriers use Western Wireless' network to terminate intraMTA traffic (i.e., Western Wireless terminates the call to its customer), Western Wireless will obtain compensation for that function from the originating carrier, either pursuant to a formal interconnection agreement, or more likely on a bill and keep basis.